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Acting Under Authority Conferred by 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR 18-577 CRB
	)	
Plaintiff,	)	DECLARATION OF ZACHARY G.F.
	)	ABRAHAMSON IN SUPPORT OF THE UNITED
v.	)	STATES' MOTION <i>IN LIMINE</i> NO. 4:
	)	TO EXCLUDE POST-ACQUISITION EVIDENCE
MICHAEL RICHARD LYNCH and	)	AND ADMIT CERTAIN POST-ACQUISITION
STEPHEN KEITH CHAMBERLAIN,	)	STATEMENTS
	)	
Defendant.	)	Pretrial Conference: February 21, 2024
	)	Trial Date: March 18, 2024

I, Zachary G.F. Abrahamson, declare as follows:

- I am a Special Assistant United States Attorney with the United States Attorney's Office for the Northern District of California ("USAO"). I am assigned to the prosecution of the above-referenced case. I make this declaration in support of the United States' Motion *in Limine* to Exclude Post-Acquisition Evidence and Admit Certain Post-Acquisition Statements. The statements herein are based in part on personal knowledge and in part on information and belief from my review of documents in this matter and my discussions with counsel for the

1 government, law enforcement agents, and others.

2 2. Attached hereto as Exhibit A is a true, correct, and redacted copy of an FBI report from an  
3 interview of John Schultz, conducted in connection with this matter on December 11, 2023.

4 I declare, under penalty of perjury, that the foregoing is true and correct. Executed this 17th day  
5 of January 2024.

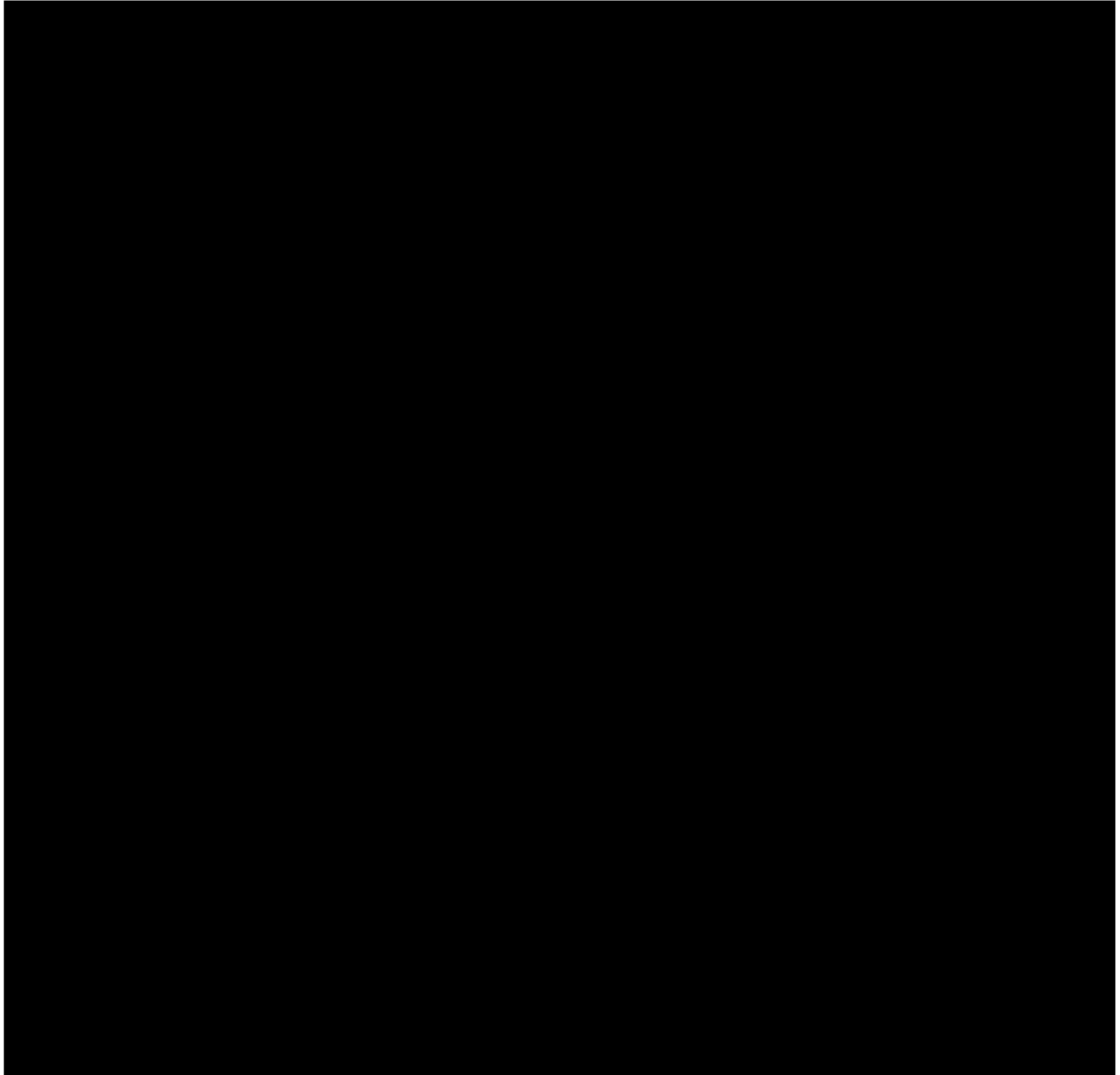
6 \_\_\_\_\_/s/\_\_\_\_\_  
7 ZACHARY G.F. ABRAHAMSON  
8 Special Assistant U.S. Attorney  
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# EXHIBIT A

**FEDERAL BUREAU OF INVESTIGATION**



Date of entry 01/16/2024



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Investigation on 12/11/2023 at San Francisco, California, United States (In Person)

File # 318A-SF-2582907-302 Date drafted 12/15/2023

by Megan M. Mellert

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[REDACTED]

[REDACTED] SCOTT told SCHULTZ about the hardware deals and how Autonomy was not able to continue selling hardware after the acquisition. SCOTT also talked to SCHULTZ about the VARs. SCOTT gave him a limited explanation but thought if Deloitte looked at it then it must have been okay. [REDACTED]

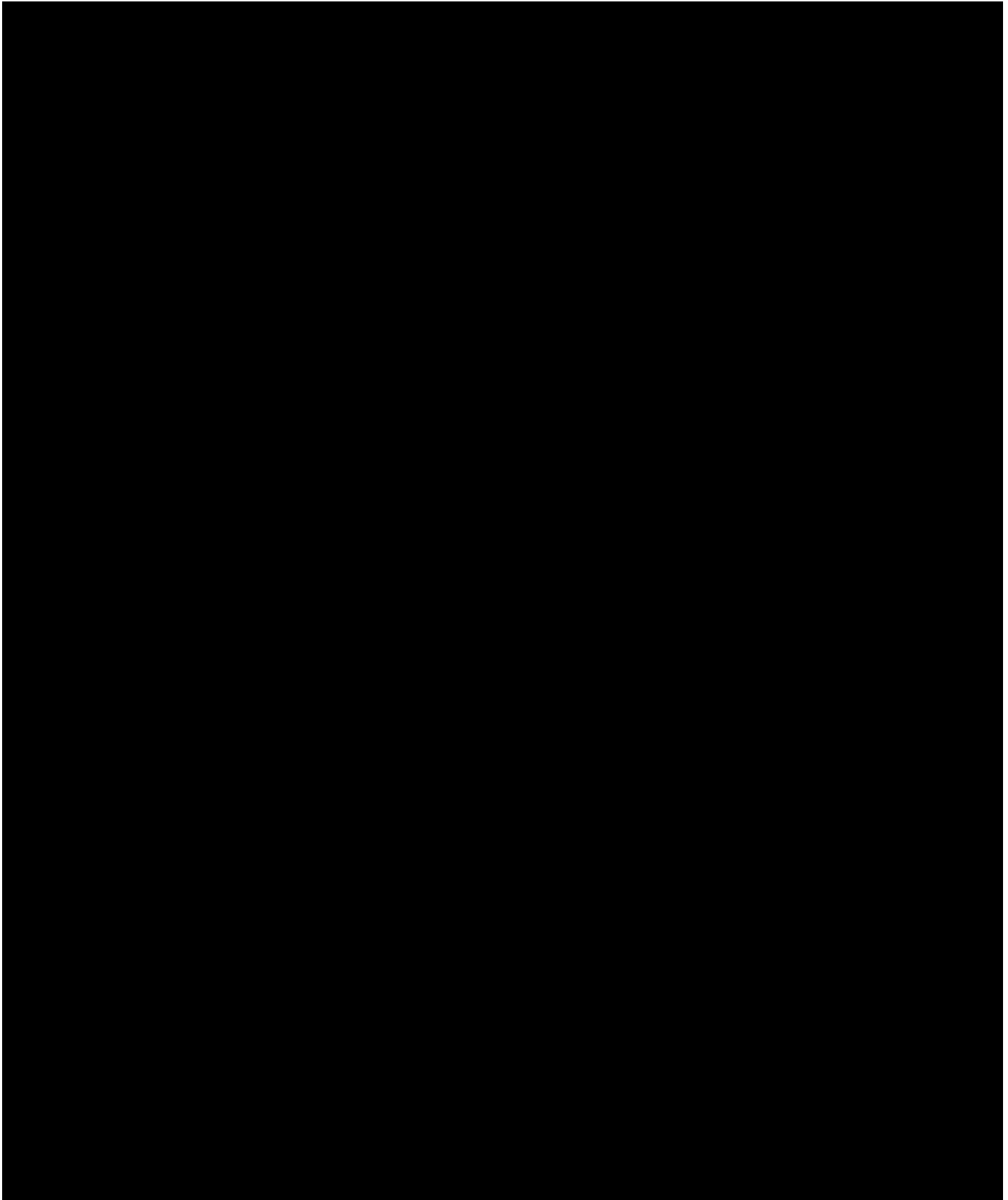
[REDACTED]

After LYNCH left the company, people started asking questions. The information from SCOTT gave way to more meetings. Some of the revenue was not what it should be. Autonomy used to use VARs and resell hardware and now that they do not, there was a miss. [REDACTED]

[REDACTED]

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